



March 10, 2005

Kamyar Guivetchi, P.E.
Manager, Statewide Water Planning
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

Dear Kamyar:

Friends of the River would like to submit the following comments on the draft “Highlights” for Bulletin 160, the California Water Plan Update.

- “Highlights” provides an easy-to-understand overview and is well written.
- In Director Lester Snow’s introduction, he refers to this document as “Bulletin 160:05.” Is it no longer Bulletin 160:03? Does this mean the next Water Plan Update will be Bulletin 160:10?
- Page 2: the graph is colorful, yet misleading. As with previous Bulletin 160’s, DWR continues to give the false impression that Wild and Scenic Rivers are the biggest consumer of water in the state. DWR must delete Wild and Scenic Rivers in the “applied water” column or include the following information directly under the graph: **Federal and State Wild and Scenic Rivers on the North Coast have never received the full allocation of water for fish and wildlife purposes for which they were originally designated. Every drop of water in Wild and Scenic Rivers in the Central Valley is used downstream of dams by agricultural and urban users.**
- Page 4: please change wording that says the State’s population “will grow” to **projected to grow**. We support language that emphasizes uncertainty in future water scenarios.
- Pages 4-5: Please change information about agricultural water “will decline” and urban water “will increase” to: **agricultural water may decline; urban water may increase. Californians have the ability to affect those choices.**
- Page 5: What does “background” mean? In the “resource intensive” scenario, please include language that says there will be **adverse consequences to the environment**. The current language implies the change will be neither good nor bad.
- Page 6: In the “vision” part of the building blocks, please change “high standard of living” to **healthy standard of living**. “High standard” connotes profligate, unsustainable use as opposed to a more equitable standard that can be shared by all Californians.

- Page 6: We continue to question the vision/initiatives/foundations building blocks. Throughout “Highlights,” water efficiency is a common thread. Water efficiency not only improves “sustainability,” it also increases “reliability” in the water system. Therefore, we recommend that DWR include the **Water Efficiency block** in both Initiatives and Foundational Actions.
- Page 7: We believe that California has a **Mediterranean climate**, not an “arid” one. We applaud DWR for saying that “efficiency will be a way to meet increased demand.”
- Page 7: In discussing transfers, please add **locally acceptable to affected communities** to the requirement that transfers be “environmentally and economically sound.”
- Page 8: We applaud DWR for using the term “environmental stewardship” and encourage you to include the term as often as possible.
- Page 9 and 10: You discuss water use efficiency in the “Initiatives” building blocks on these pages, reinforcing the need to add the Water Efficiency block to the Initiatives, as recommended in our comments for Page 6.
- Page 13: We read the phrase “reform State government” and wonder what this means. Is it merely a throw-away line that must be inserted in all Administration documents?
- Page 15: We do not understand the difference between the light blue and dark blue colors in the graph.
- Page 18: In discussing floodplain management, please include **preventing development in floodplains**.
- Page 19: In discussing Delta levees, we are left with the impression that levees have always been in the Delta and that they have always protected and improved the ecological health of the Delta. We recommend that you include one sentence that explains how the Delta functioned naturally, before the State Water Project and the human engineering projects decimated this ecosystem.
- Page 21, Recommendations: In #2 or #8, please include **volumetric water pricing** and the CALFED requirement of **beneficiary pays**. In #12, please define “public trust” because many people may not understand its meaning or importance. Finally, “Bravo” for #14. Friends of the River will eagerly anticipate more information on DWR’s plans to “encourage and assist representatives of disadvantaged communities” to have a greater voice in water policy and planning.

Thank you for the opportunity to comment.

Sincerely,

Betsy Reifsnider
Consultant
Friends of the Rivers